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**Entered on Docket
August 22, 2013**

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Attorney for Defendant

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

In Re: ASSET RESOLUTION, LLC) Case No.: 13-01071-rcj
)
_____)
) BK-S-09-32824-RCJ (Lead Case)
TODD HANSEN, as TDI Representative)
under the Order entered September 20,) STIPULATION DISCOVERY PLAN
2012,) AND ORDER
)
Plaintiffs,)
)
vs.)
)
KENNETH E. SCHMIDT,)
)
Defendant.)
)
)
)
)
)

STIPULATED DISCOVERY PLAN AND SCHEDULING ORDER

Pursuant to Fed. R. Civ. P. 26(f) and Local Rule 26-1, counsel for Plaintiff TODD HANSEN (“HANSEN”), as TDI Representative, and counsel for Defendant, KENNETH E. SCHMIDT (“SCHMIDT”), hereby submit this Stipulated Discovery Plan and Scheduling Order.

I. RULE 26(F) CONFERENCE OF THE PARTIES

Pursuant to Fed. R. Civ. P. 26(f) and Local Rule 26-1, counsel for Hansen and Schmidt have conferred on a number of items: (i) the issues in the case; (ii) the possibility for a prompt settlement or resolution of the case; (iii) arranging for the disclosures required by Rule 26(a)(1); (iv) a proposed discovery plan; and (v) dates for trial.

II. PROPOSED SCHEDULE

The parties request that the Court adopt the following schedule:

EVENT	DATE
Initial Disclosures	September 15, 2013
Plaintiff’s FRCP 26 Expert Disclosures	October 1, 2013
Defendant’s Expert Disclosures	October 15, 2013
Completion of Discovery	January 15, 2014
Deadline for filing Dispositive Motions	March 3, 2014
Final Witness and Exhibit List	30 Days Prior To Trial
Final Pre-Trial Conference	April 15, 2014 at 9:00 in Reno Courtroom 6
Proposed Findings of Fact Conclusions of Law	One week prior to trial
Proposed Trial Dates	May 5, 2014,
Time estimated for trial	One full day

1 DATED this 31st day of July, 2013

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3 Respectfully submitted,

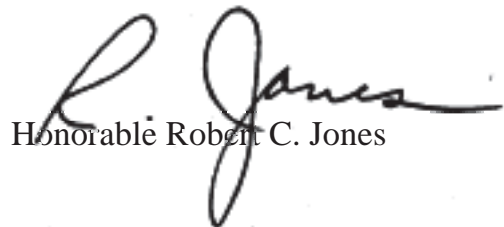
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6 By: /s/ FRANCIS B. MAJORIE
FRANCIS B. MAJORIE, ESQ.
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20 Counsel for Defendant
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ORDER

IT IS SO ORDERED:

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Honorable Robert C. Jones

CERTIFICATE OF SERVICE

I hereby certify that on this 31st day of July, 2013, I forwarded a true and correct copy of the foregoing **STIPULATED DISCOVERY PLAN AND SCHEDULING ORDER** by filing and serving the same by via the Court's CM/ECF filing system.

_____/s/ _SeanFlanagan_____
Sean P. Flanagan, Esq.